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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AUDLEY BARRINGTON LYON, JR., et. al.,

Plaintiffs,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, et. al.,

Defendants.

Case No.: 13-cv-05878 EMC

**JOINT STIPULATION REQUESTING
TELEPHONIC APPEARANCE OF
CERTAIN COUNSEL FOR
DEFENDANTS AT FINAL PRETRIAL
CONFERENCE; [~~PROPOSED~~] ORDER**

CLASS ACTION

The Parties to this action hereby agree to the following and seek an order permitting undersigned counsel for Defendants, Katherine J. Shinners, to appear by telephone at the Final Pretrial Conference scheduled for April 19, at 2:30 p.m. As good cause for this request, the Parties state the following:

1 The Final Pretrial Conference in this matter is scheduled for tomorrow, April 19, at 2:30
2 p.m. *See* ECF No. 96 (scheduling order); ECF No. 107 (rescheduling Final Pretrial Conference
3 to April 19, 2016).

4 Defendants state that undersigned counsel for the Defendants, Katherine J. Shinnars,
5 planned to attend the hearing in person, along with co-counsel Brian Ward and Lauren Bingham.
6 This morning (April 18, 2016), Ms. Shinnars's close family member passed away. Under these
7 extraordinary circumstances, Ms. Shinnars seeks to appear at the Final Pretrial Conference by
8 telephone, in order to focus on her family obligations and minimize time away from her family.
9 Mr. Ward and Ms. Bingham will still attend the conference in person. Ms. Shinnars, however, is
10 currently designated as lead counsel and has been primarily responsible for conferences
11 regarding the Parties' objections and responses to discovery responses, exhibits, and deposition
12 designations, and for many aspects of the case that will be addressed at the Pretrial Conference,
13 and her appearance at the Pretrial Conference by telephone will be of assistance to the Court.
14 *See* ECF No. 96 (requiring lead counsel to appear at Final Pretrial Conference).

15 Accordingly, the Parties respectfully request that Ms. Shinnars be permitted to appear
16 by telephone at the Final Pretrial Conference.

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1 Dated: April 18, 2016

OFFICE OF IMMIGRATION LITIGATION,
CIVIL DIVISION
U.S. DEPARTMENT OF JUSTICE

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

WILLIAM C. PEACHEY
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By: /s/ Katherine J. Shinnors
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Attorneys for Defendants

17
18 Dated: April 18, 2016

By: /s/ Julia Harumi Mass

19 AMERICAN CIVIL LIBERTIES UNION
20 FOUNDATION OF NORTHERN CALIFORNIA
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28

JOINT STIPULATION REQUESTING TELEPHONIC
APPEARANCE OF CERTAIN COUNSEL
Case No.: 13-cv-05878 EMC

ALEXIS YEE-GARCIA (SBN 277204)

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Attorneys for Plaintiffs

I, Katherine J. Shinnners, am the ECF user whose user ID and password are being used to file this Stipulation. In accordance with Local Rule 5-1(i)(3), I hereby attest that the other signatories listed here have concurred in the filing of this document.

Dated: April 18, 2016

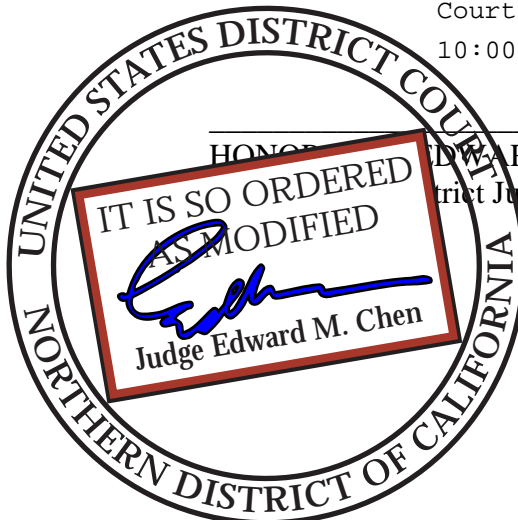
By: /s/ Katherine J. Shinnners
KATHERINE J. SHINNERS

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Ms. Shinnners shall email the Court her direct number by 10:00 a.m. on 4/19/16.

Dated: 4/18/16



JOINT STIPULATION REQUESTING TELEPHONIC
APPEARANCE OF CERTAIN COUNSEL
Case No.: 13-cv-05878 EMC

CERTIFICATE OF SERVICE

No. 3:13-cv-05878-EMC

I hereby certify that on this 18th day of April, 2016, a true and correct copy of the foregoing **JOINT STIPULATION REQUESTING TELEPHONIC APPEARANCE AT FINAL PRETRIAL CONFERENCE** was served with the Clerk of Court by using the CM/ECF system, which provided an electronic notice and electronic link of the same to all attorneys of record through the Court's CM/ECF system.

By: /s/ Katherine J. Shinnors
KATHERINE J. SHINNERS
Trial Attorney, District Court Section
Office of Immigration Litigation
United States Department of Justice